

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

ERIC CHENG (CABN 274118)  
AJAY KRISHNAMURTHY (CABN 305533)  
ALETHEA M. SARGENT (CABN 288222)  
Assistant United States Attorneys

1301 Clay Street, Suite 340S  
Oakland, California 94612  
Telephone: (510) 637-3680  
FAX: (510) 637-3724  
eric.cheng@usdoj.gov  
ajay.krishnamurthy@usdoj.gov  
alethea.sargent@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	<b>CASE NO. 4:23-cr-00264 JSW</b>
	)	
Plaintiff,	)	<b>JOINT STATUS REPORT</b>
	)	
v.	)	
	)	
PATRICK JAMES BERHAN,	)	
MORTEZA AMIRI,	)	
AMANDA CARMELLA THEODOSY,	)	
SAMANTHA GENOVEVA PETERSON,	)	
ERNESTO JUAN MEJIA-OROZCO, and	)	
BRAULI RODRIGUEZ JALAPA,	)	
	)	
Defendants.	)	
	)	

This matter is set for status conference hearings on January 30, 2024 (as to Defendants Amiri, Theodosy, and Mejia-Orozco) and February 13, 2024 (as to Defendants Berhan and Rodriguez). The Court has ordered the parties to submit a joint status report by January 23, 2024. Dkt. 98. The parties hereby respectfully submit this joint status report.

On August 16, 2023, a federal grand jury returned an indictment charging the Defendants with

1 conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, and wire fraud, in violation of 18  
2 U.S.C. § 1343. Defendant PETERSON entered a guilty plea on January 9, 2024.

3 In September, the United States produced a first tranche of discovery for all defendants except  
4 Defendant AMIRI, who was not yet represented by counsel and did not yet have a protective order in  
5 place. In October, once counsel for Defendant AMIRI appeared and a protective order was issued, the  
6 United States produced its first tranche of discovery to Defendant AMIRI. In November, the United  
7 States produced its second tranche of discovery, which comprised “pertinent” phone data seized by law  
8 enforcement agents pursuant to search warrants, to all defendants. In December, new counsel was  
9 appointed to represent Defendant AMIRI. At the end of December, the United States produced a third  
10 tranche of discovery to all defendants, with the exception of Defendant AMIRI. Defendant AMIRI’s  
11 new counsel filed a notice acknowledging the protective order on January 11, 2024, and the government  
12 subsequently produced the discovery to date to Defendant AMIRI’s new counsel. Counsel for  
13 Defendant MEJIA-OROZCO has also provided a hard drive to the FBI so that a full forensic image of  
14 his own client’s phone can be copied for him by the FBI’s Silicon Valley Regional Computer Forensics  
15 Laboratory, a process that is in progress.<sup>1</sup>

16 .  
17 DATED: January 23, 2024

Respectfully submitted,

18 ISMAIL J. RAMSEY  
19 United States Attorney

20 /s/  
21 ERIC CHENG  
22 AJAY KRISHNAMURTHY  
23 ALETHEA SARGENT  
24 Assistant United States Attorneys

25 /s/  
26 EDWARD ROBINSON  
27 NANCY KARDON  
28 Counsel for Defendant PATRICK JAMES  
BERHAN

<sup>1</sup> As noted above, the government has already produced materials from these devices that were seized by law enforcement agents pursuant to search warrants.

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/s/  
KATHRYN ROSS  
Counsel for Defendant MORTEZA AMIRI

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/s/  
PAUL GOYETTE  
Counsel for Defendant AMANDA  
CARMELLA THEODOSY

\_\_\_\_\_  
/s/  
STEVE KALAR  
MICHAEL HINCKLEY  
Counsel for Defendant ERNESTO JUAN  
MEJIA-OROZCO

\_\_\_\_\_  
/s/  
ADAM PENNELLA  
Counsel for Defendant BRAULI  
RODRIGEUS JALAPA